

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

NANCY RINEHART, individually and on behalf of all others similarly situated,

Plaintiff,

v.

AS AMERICA, INC. d/b/a American Standard, a Delaware corporation and **SAFETY TUBS COMPANY, LLC**, a Delaware limited liability company,

Defendants.

CASE No. 3:16-cv-05128-MAS-LHG

MOTION FOR REASONABLE ATTORNEYS' FEES

Plaintiff Nancy Rinehart (“Plaintiff” or “Rinehart”), by and through her undersigned counsel and having reached a class action settlement agreement with Defendants, AS America, Inc. d/b/a American Standard and Safety Tubs Company, LLC (“Defendants”), respectfully move this Court for an order granting Settlement Class Counsel attorneys’ fees and expenses in an amount equal to 29% of the Settlement Fund and for an order awarding Plaintiff an Incentive Award in the amount of \$5,000.

In support, Plaintiff submits the accompanying Memorandum in Support and the declaration of Patrick H. Peluso.

For the reasons set forth in the accompanying memorandum, Plaintiff

respectfully requests the Court grant the requested attorneys' fees and incentive award.

Dated: June 14, 2018

Respectfully submitted,

Nancy Rinehart, *individually and on behalf of all others similarly situated,*

By: s/Patrick H. Peluso
One of Plaintiff's Attorneys

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CERTIFICATE OF SERVICE

The undersigned certifies that, on June 14, 2018, I caused this document to be electronically filed with the Clerk of the Court using the CM/ECF system, which will send a notification of filing to all counsel of record for each party.

s/ Stefan Coleman